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999100-0130

VIA E-MAIL: LEVANS@FEC.GOV

Mr. Leonard O. Evans, III  
Attorney, Enforcement Division  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Re: MUR 6540

Dear Mr. Evans:

I am in receipt of your letter with press clippings regarding the meeting held in Michigan earlier this year at which former US Senator Rick Santorum spoke, during the time when he was a candidate for the Republican nomination for President.

It is not clear to me exactly why you forwarded the press clippings but let me reiterate the following facts:

1. Mr. Glenn Clark was not a paid staff member of the Santorum campaign. He was a volunteer who endorsed Sen. Santorum in his individual capacity. As the President of the Michigan Faith and Freedom Coalition, he was and is well-acquainted with the faith-based grassroots activists in Michigan and is someone any conservative candidate for office would seek out for support.

2. As Mr. Clark stated in the February 14, 2012 article you forwarded from [www.candgnews.com](http://www.candgnews.com), regarding his relationship with Sen. Santorum: "I'm a friend of his [ Sen. Santorum's], and I remember him, although he might not remember me, from when he came in to Michigan in 2010," said Clark, the Michigan Faith and Freedom Coalition president.

3. The same article referenced above noted that there was no 'endorsement' of Sen. Santorum's candidacy for president by any of the organizations involved in the event.

4. The event at issue was not a campaign event and Sen. Santorum did not control the agenda or the attendees. Other non-candidates also spoke. No campaign materials were allowed at the event and the Santorum campaign did not distribute campaign materials at the event.

5. The Michigan Faith and Freedom Coalition made no coordinated public communications regarding the Santorum campaign because the event did not meet the multiple part test required by federal law and Commission regulations at 11 C.F.R. §109.21.

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6. Mr. Clark was and is a valued volunteer and supporter of Sen. Santorum, but was not in a position to know or share proprietary or non-public information about the needs, activities, plans or projects of the Santorum presidential campaign.

The facts remain: Sen. Santorum was invited to appear at a meeting / event along with other speakers who were not candidates for office. The event was not a campaign 'rally' nor was the Santorum campaign in any way involved in the event's planning or promotion.

Surely the Commission is not going to start prosecuting organizations and volunteers for inviting presidential candidates to attend and speak at their events. That will be an interesting lawsuit in federal court when and if the Commission starts down that path.

Surely you and your colleagues have something better to do with the taxpayers dollars than pursuing this frivolous complaint that should be dismissed without further waste of everyone's time.

Sincerely,

A handwritten signature in black ink that reads 'Cleta Mitchell'.

Cleta Mitchell, Esq., Counsel  
Santorum for President

cc: Nadine Maenza, Treasurer  
Rick Santorum for President